

Shane Clayton  
Nevada State Bar No. 8783  
DURHAM JONES & PINEGAR  
111 S. Main Street, Suite 2400  
P.O. Box 4050  
Salt Lake City, Utah 84110-4050  
Telephone: (801) 415-3000  
Facsimile: (801) 415-3500  
SClayton@djplaw.com

*Attorneys for Defendant Early Warning Services, LLC*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

DALE C. BURNS and RANDALL B.  
BURNS,

Plaintiffs,

v.

EARLY WARNING SERVICES, LLC, and  
LEXISNEXIS RISK SOLUTIONS, INC.,

Defendants.

Civil No. 2:19-cv-2142-RFB-DJA

**STIPULATION TO EXTEND TIME  
TO FILE RESPONSIVE  
PLEADING  
(First Request)**

Defendant Early Warning Services, LLC (“EWS”) and Plaintiffs Dale C. Burns and Randall B. Burns, by counsel, and pursuant to LR IA 6-1, submit the following Stipulation to Extend Time to File Responsive Pleading up to and including February 28, 2020. In support of the Stipulation, the parties state the following:

1. EWS signed a waiver of service making its responsive pleading due on or around February 14, 2020.

2. The undersigned counsel for EWS was recently retained by EWS in connection with this matter and is continuing to review the allegations asserted in the Complaint.

3. Due to the undersigned’s recent engagement, counsel was unable to request an extension of time prior to the expiration of the original deadline to respond to the Complaint.

1           4.       Counsel for Plaintiff has agreed to the requested extension and the requested  
2 extension will not impact any other deadlines in this case.

3           5.       This is the first request to extend the deadline for EWS to file its responsive  
4 pleading.

5           6.       Therefore, the parties hereby stipulate that the deadline for EWS to file its  
6 responsive pleading shall be extended through February 28, 2020

7           Dated this 13th day of February, 2020.

8       Respectfully Submitted,

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10       By: /s/ Shane Clayton  
11       Shane Clayton, Esq.  
12       DURHAM JONES & PINEGAR  
13       111 S. Main Street, Suite 2400  
14       P.O. Box 4050  
15       Salt Lake City, Utah 84110-4050  
16       Attorney for Defendant Early Warning  
17       Services, LLC

By: /s/ Miles N. Clark  
David H. Krieger, Esq.  
Nevada Bar No. 9086  
HAINES & KRIEGER, LLC  
8985 S. Eastern Ave., Suite 350  
Henderson, NV 89123

Matthew I. Knepper, Esq.  
Nevada Bar No. 12796  
Miles N. Clark, Esq.  
Nevada Bar No. 13848  
KNEPPER & CLARK LLC  
5510 S. Fort Apache Rd, Suite 30  
Las Vegas, NV 89148-7700  
Attorneys for Plaintiffs

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20       IT IS SO ORDERED:

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23       UNITED STATES MAGISTRATE JUDGE

24       DATED: February 14, 2020

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**CERTIFICATE OF SERVICE**

I hereby certify that on this 13th day of February 2020, a copy of the foregoing was filed electronically through the Court's CM/ECF system, which causes service upon all counsel registered thereon.

/s/ Shane Clayton